	ES DISTRICT COURT
FOR THE NORTHERN	DISTRICT OF CALIFORNIA AND DIVISION
JONGERIUS PANORAMIC TECHNOLOGIES, LLC  Plaintiff,  v.  GOOGLE INC., and GOOGLE INC.,	Case No. 4:12-cv-03797-YGR  GOOGLE INC.'S UNOPPOSED  MOTION FOR EXTENSION OF TIME  TO ANSWER PLAINTIFF'S SECOND  AMENDED COMPLAINT  JURY TRIAL DEMANDED
Defendant.	HON. YVONNE GONZALEZ-ROGERS

## GOOGLE INC.'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER PLAINTIFF'S SECOND AMENDED COMPLAINT

Defendant, Google Inc. ("Google"), by and through its counsel, respectfully requests this Court to enter an Order granting it an extension of time, through and including May 17, 2013, to respond to Plaintiff's Second Amended Complaint. (D.I. 139). In support of this motion, Google states as follows:

- 1. Plaintiff filed its Motion for Leave to File a Second Amended Complaint on March 11, 2013. (D.I. 143).
- Google's response to the Second Amended Complaint is currently due April 2. 19, 2013, according to this Court's Order entered on April 9, 2013. (D.I. 154).
- 3. The applicable rules of procedure governing this action permit this Court, in its discretion, to enlarge a period of time for "good cause" when a request is made prior to the expiration of time originally allowed. Fed. R. Civ. P. 6(b).
- 4. Google respectfully submits that good cause exists for an extension of time for it to respond to the Second Amended Complaint. On Friday, April 12, 2013, all parties jointly moved the Court to stay this case pending the resolution of *inter partes* review proceedings before the United States Patent and Trademark Office. (D.I. 155).
- On April 16, 2013, Defendant, Apple Inc. ("Apple") filed a Motion for Extension of Time to Answer Plaintiff's Second Amended Complaint. Google seeks a similar extension.
- 6. This is Google's first request for an extension of time to respond to the Second Amended Complaint.
- 7. The brief, one month, extension of time requested will not prejudice any party, nor will it cause any significant delay in the prosecution of this action.
  - 8. Plaintiff Jongerius Panoramic Technologies LLC does not oppose this motion.

FOR THE FOREGOING REASONS, Defendant, Google Inc. respectfully requests that the Court grant it an extension of time, through and including May 17, 2013, to respond to Plaintiff's Second Amended Complaint.

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4	Respectfo	ully submitted,
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6	Dated: April 16, 2013 By: /s/ Ch	aranjit Brahma
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10		TECHNOLOGIES, LLC.
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1	FILER'S ATTESTATION
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3	I CHARANJIT BRAHMA CERTIFY that I am the ECF User whose ID and
4	password is being used to file this joint stipulation. In compliance with General Order 45,
5	paragraph X.B, I hereby attest that Brent Bumgardner has consented in this filing.
6	/ / Cl P I
7	<u>/s/ Charanjit Brahma</u> Charanjit Brahma
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10	<u>CERTIFICATE OF SERVICE</u>
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12	I HEREBY CERTIFY that on April 16, 2013, I electronically filed the foregoing
13	GOOGLE INC.'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
14	ANSWER PLAINTIFF'S SECOND AMENDED COMPLAINT with the Clerk of the
15	Court by using the CM/ECF system which will send a notice of electronic filing to all
16	counsel of record.
17	/s/ Charanjit Brahma
18	Charanjit Brahma
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1	PROPOSED ORDER			
2	PURSUANT TO THE STIPU	PURSUANT TO THE STIPULATED, IT IS SO ORDERED.		
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4	Dated: April, 2013	HON. YVONNE GONZALEZ ROGERS		
5		United States District Judge Northern District of California		
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